

REMARKS

Reconsideration and allowance in view of the foregoing amendments and the following remarks is respectfully requested.

Claim amendments/Status

In this response, claim 1 has been further amended to clarify the subject matter for which patent protection is sought. Support for the amendments is found at least on page 4, lines 14-18, of the originally filed specification.

Claims 1-13 remain pending in the application.

Rejections under 35 USC § 103

The rejection of claim 1 under 35 USC 103(a) as being unpatentable over Acero et al. (Grammar Learning for Spoken Language Understanding) in view Meng et al. (Semi-Automatic Acquisition of Domain-Specific Semantic Structures) and further in view of Monaco (US Patent 6,434,523), is respectfully traversed.

In brief, Acero and Monaco were discussed in the previous response. Those comments/arguments are reiterated herein. In addition thereto, Applicants submit that Acero does not teach a conceptual model like that claimed, since it does not comprise any syntactic grammar.

In this response, claim 1 has been amended to call for “.. generic syntactic and semantic grammar and basic vocabulary by manually describing resources specific to the application” (see e.g. page 4, lines 14-18). It is further submitted that Monaco does not suggest the use of any reference language model (conceptual model).

In connection with Meng, it is submitted that this reference discloses a method which is based on the building of statistically most probable clusters of words (spatial and temporal clustering : see e.g. chapter II “A statistical approach”), this approach requiring an iterative process (with at least 50 iterations without prior knowledge and about 20 with prior knowledge:

see in figures 1 and 2 the saturation thresholds of the “terminals” curves and the corresponding explanations of the last paragraph of the 2<sup>nd</sup> page and of the paragraph just under figure 2).

Such a statistical clustering method is not at all used in the claimed arrangement, and this reference fails to teach our “conceptual model” (comprising a generic grammar and a basic vocabulary). Moreover, this reference fails to teach our conceptual model comprising the mutual relationships interlinking the data that are inputted by the operator through input means 1, this conceptual model being inputted by the operator through interface means 7 (see e.g. description of Fig 2 in page 4 of the first filed text).

Therefore, due to completely different methods (statistical clustering method vs method using semantic classes with attached XML tags), Meng could never be combined with Acero. In the same way, since Monaco merely discloses a tool for building grammar rules, this arrangement could never be combined either with Acero or Meng.

It is therefore submitted that the proposed combination of references would not lead one of ordinary skill to the claimed subject matter and therefore cannot be relied upon to establish a *prima facie* case of obviousness.

### Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

Early issuance of a Notice of Allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including

extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,  
**LOWE HAUPTMAN HAM & BERNER, LLP**



Kenneth M. Berner  
Registration No. 37,093

1700 Diagonal Road, Suite 300  
Alexandria, Virginia 22314  
(703) 684-1111  
(703) 518-5499 Facsimile  
Date: September 2, 2009  
KMB/KJT/ser